

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

KEVIN LIPMAN as Administrator
of the Estate of Ta’Naejah McCloud,
Deceased, **SHABRINA McCLOUD**,

Plaintiffs,

-vs-

ARMOND BUDISH, in his official capacity
as County Executive Cuyahoga County,
**CUYAHOGA COUNTY CHILDREN AND
FAMILY SERVICES, TEQUILA CRUMP,
URSULA OWENS, KRISTINA QUINT,
ADA JACKSON, MARQUETESE BETTS,
JOHN/JANE DOE I-VII individually and or
Agents of Cuyahoga County,**

Defendants.

CASE NO: 18-CV-02985

JUDGE PATRICIA A. GAUGHN

PLAINTIFFS’ MOTION FOR LEAVE TO FILE UNDER SEAL

NOW COME the Plaintiffs SHABRINA McCLOUD and KEVIN LIPMAN, as Administrator of the Estate of Ta’NAEJAH McCLOUD, by and through their attorneys, THE DERATANY FIRM and OBRAL SILK & ASSOCIATES, and for their motion for leave to file under seal, state as follows:

1. This is a 2018 case arising from the death of Plaintiff’s decedent in 2017. Plaintiff’s decedent, Ta’Naejah McCloud, was a 5 year-old child who Plaintiffs allege was horrifically beaten to death by her biological mother, Tequila Crump, and her biological mother’s girlfriend, Ursula Owens. Plaintiffs’ claim that the unconstitutional and/or willful and wanton acts of the defendants were a cause or contributing cause to Ta’Naejah’s death.

2. The basis for the lawsuit, in part, is acts/omissions of Cuyahoga County Children Family Services (“CCDCFS”), a child protection agency charged with providing social services to children.

3. A Stipulated Protective Order filed with the Court on 4/12/19 requires deposition testimony pertaining to this matter be filed under seal. (Dkt # 15.)

4. Plaintiffs seek to file a Motion to Reconsider, which cites deposition testimony and transcripts.

5. In order to maintain the confidentiality required by the Stipulated Protective Order, Plaintiffs respectfully request that their Motion to Reconsider be filed under seal.

WHEREFORE, PLAINTIFFS SHABRINA McCLOUD and KEVIN LIPMAN, as independent administrator of the estate of Ta'NAEJAH McCLOUD, deceased, move this Honorable Court for leave to file their Motion to Reconsider under seal.

Respectfully submitted,

/s/Jay Paul Deratany

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 10, 2019, the foregoing Plaintiffs' Motion for Leave to File Under Seal was filed electronically. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

The undersigned hereby certifies that a copy of the foregoing Plaintiffs' Motion for Leave to File Under Seal was served by U.S. First Class Mail, postage prepaid on June 10, 2019, upon the following:

Tequila Crump, Inmate No. W101504, c/o Warden, Wanza Jackson, Dayton Correctional Institution, 4104 Germantown Street, Dayton, OH 45417

Ursula Owens, Inmate No. W101555, c/o Warden, Wanza Jackson, Dayton Correctional Institution, 4104 Germantown Street, Dayton, OH 45417

Respectfully submitted,

/s/Jay Paul Deratany

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